

EXHIBIT A

From: [Chutter-Ames, Hillary](#)
To: [Adam Kern](#)
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Subject: Doe v. Deutsche Bank; Doe v. JP Morgan; USVI v. JP Morgan; JP Morgan v. Staley: Proposed Revised CMP

Dear Mr. Kern:

I am writing on behalf of all parties in the JPMorgan Chase and Deutsche Bank matters in response to the Court's direction at last week's hearing that the parties discuss new Case Management Plan deadlines and report back to the Court.

The parties have conferred, but were not able to reach agreement. Their respective proposals are set forth below. The primary disputes reflected in these proposals include:

- Whether to have a temporary standstill on depositions, and if so, how long?
- How long to extend the current fact discovery deadline of April 24?
- When class certification rebuttal expert reports and briefs should be due?
- Defendants' deadlines for responding to the operative complaints

The parties would like to address their views with you and will call at 1:30 p.m. today or any other time you prefer.

Sincerely,
 Hillary

Event	Current Deadline	Plaintiffs' Proposal	JPMC and DB Proposal	Staley Proposal
Class Certification Expert Report	March 1, 2023	March 1, 2023	March 1, 2023	N/A
Class Certification Rebuttal Expert Report(s)	March 16, 2023	March 23, 2023	April 13, 2023	N/A
Class Certification Reply Expert Report(s), if any	March 27, 2023	April 3, 2023	April 24, 2023	N/A
Deposition Standstill		None	Until April 3, 2023	Until May 31, 2023
Staley Response to JPMC Complaint			April 10, 2023	May 8, 2023
Motion for Class Certification	March 31, 2023	April 7, 2023	April 28, 2023	N/A
Requests to Admit	March 17, 2023	April 7, 2023	April 17, 2023	June 30, 2023
JPMC and DB Answers to FACs	April 3, 2023	Affirmative defenses by April 3, 2023	April 17, 2023	N/A
Opposition Brief to Class Certification	April 21, 2023	April 28, 2023	May 19, 2023	N/A
Fact Discovery closes	April 24, 2023	May 1, 2023	May 22, 2023	July 31, 2023
Proponent of a Claim Expert Reports	April 4, 2023	May 9, 2023	May 26, 2023	August 7, 2023
Reply Brief In Support of Class Certification	May 5, 2023	May 12, 2023	May 29, 2023	N/A
Opponent of a Claim Expert Reports	April 18, 2023	May 23, 2023	June 9, 2023	August 21, 2023

Complete Expert Depositions	April 24, 2023	June 5, 2023	June 16, 2023	August 28, 2023
Summary Judgment Motions	May 1, 2023	June 9, 2023	June 19, 2023	September 8, 2023
Summary Judgment Responses	May 22, 2023	June 30, 2023	July 10, 2023	September 22, 2023
Summary Judgment Replies	June 5, 2023	July 14, 2023	July 20, 2023	September 29, 2023
Pre-Trial Conference	June 12, 2023	July 24, 2023	30 days before trial	October 6, 2023

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